



St Mary's C E Primary School



Whistleblowing Policy

"Live, Love and Learn together in the Light of the Life of Christ"

Rooted in Ephesians 5:8–11, 13–14

1. Introduction

At St Mary's C E Primary School, our Christian vision calls us to live as "children of light", acting with integrity, courage and compassion. We are committed to creating a culture where concerns can be raised openly, safely and responsibly, in the service of justice, dignity and the flourishing of all.

The Governing Body is dedicated to the highest standards of openness, accountability and ethical conduct. All staff, governors, volunteers and contractors are encouraged to raise concerns about wrongdoing at the earliest opportunity, confident that they will be listened to, taken seriously and protected.

This policy aligns with:

- Public Interest Disclosure Act 1998 (PIDA)
- Employment Rights Act 1996 (as amended)
- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children 2023
- DfE Governance Handbook 2024
- Brent Council Whistleblowing Procedure
- Church of England guidance on whistleblowing and safeguarding

This policy replaces all previous versions.

2. Purpose of the Policy

This policy aims to:

- Promote a culture of transparency, trust and accountability.
- Ensure staff feel confident to raise concerns in the public interest.
- Provide clear, safe routes for reporting concerns.
- Ensure concerns are handled sensitively, fairly and promptly.
- Protect whistleblowers from victimisation or detriment.

- Uphold our Christian vision by ensuring that wrongdoing is challenged and addressed.

3. Scope of the Policy

Whistleblowing applies to concerns that are in the public interest and relate to wrongdoing, risk or malpractice. These include, but are not limited to:

- Criminal offences
- Failure to comply with legal obligations
- Safeguarding failures or risks to children
- Health and safety dangers
- Financial malpractice, fraud or misuse of public funds
- Environmental damage
- Breaches of professional codes of conduct, policies or ethical standards
- Conduct that undermines the school's integrity or reputation
- Deliberate concealment of wrongdoing

These categories reflect statutory definitions within PIDA and current DfE guidance.

Matters not covered

These should be addressed through other procedures:

- Child protection concerns → Report immediately to the Designated Safeguarding Lead (DSL)
- Personal employment grievances → Use the Grievance Policy
- Complaints from parents/public → Use the Complaints Procedure
- Allegations against staff, volunteers, supply staff and contractors that may meet the harm threshold will be managed in accordance with Part Four of Keeping Children Safe in Education and referred to the Local Authority Designated Officer (LADO) where required.
- Data breaches → Report to the Data Protection Officer

4. Raising a Concern

Concerns should be raised as early as possible.

4.1 Internal routes

Staff may raise concerns with:

- Their line manager
- The Headteacher
- The Chair of Governors (if the concern involves the Headteacher)

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- Governors may raise concerns with the Chair of Governors, or where the concern relates to the Chair, with the Vice-Chair of Governors or the Local Authority Monitoring Officer.

4.2 If internal reporting is not appropriate

Staff may report directly to [Brent Council's Whistleblowing Officer](#) if:

- They believe the concern is extremely serious
- They fear victimisation
- They fear evidence may be concealed

The concern has been raised internally but not addressed

4.3 External reporting

In rare cases, disclosures may be made to:

- [The Police](#)
- [Ofsted](#)
- [The Education and Skills Funding Agency \(ESFA\)](#)
- [The Local Authority](#)
- [The Diocese \(LDBS\)](#)
- [A Member of Parliament](#)
- [Protect](#) (formerly Public Concern at Work)

External disclosures are protected only if they meet PIDA requirements.

5. Safeguarding Concerns

Any concern relating to harm, risk or abuse of a child must be reported immediately to the Designated Safeguarding Lead (DSL) or a Deputy DSL in line with Keeping Children Safe in Education.

Where a concern involves the Headteacher or a member of the senior leadership team, staff should contact:

- The Chair of Governors, and/or
- The Local Authority Designated Officer (LADO)

Safeguarding concerns always take precedence. Concerns regarding the conduct of adults working in the school that do not meet the harm threshold should be reported and managed in accordance with the school's Low-Level Concerns Policy. All staff are encouraged to share concerns, no matter how small, to support a strong safeguarding culture.

Staff may also make a whistleblowing disclosure where they believe safeguarding concerns are not being appropriately addressed by the school. In such circumstances concerns may be escalated to the Local Authority, LADO, Ofsted or other relevant safeguarding agencies.

6. Confidentiality and Anonymity

The school will make every effort to protect the identity of whistleblowers. However, confidentiality cannot always be guaranteed if:

- The matter leads to criminal or disciplinary proceedings
- The whistleblower is required as a witness
- Disclosure is required by law

Anonymous disclosures will be considered but may limit the investigation. Information relating to whistleblowing concerns will be shared only on a need-to-know basis and in accordance with data protection legislation, safeguarding requirements and the school's record retention procedures.

7. Protection from Victimisation

Under PIDA and the Employment Rights Act 1996, whistleblowers are protected from:

- Dismissal
- Disciplinary action
- Bullying or harassment
- Any form of detriment

Any retaliation against a whistleblower will be treated as a serious disciplinary matter.

8. How the School Will Respond

The Headteacher, senior leader or Chair of Governors will:

1. Acknowledge the concern
2. Assess the information
3. Determine the appropriate route (internal investigation, LADO referral, external agency)
4. Conduct or commission an investigation
5. Provide feedback where legally appropriate

Investigations will be conducted sensitively, objectively and promptly.

9. Advice and Support

Staff may seek advice from:

- The Headteacher
- The Chair of Governors
- Brent Council HR, Legal or Audit teams
- Their trade union
- Protect (formerly Public Concern at Work) – national whistleblowing charity

10. Malicious or Vexatious Allegations

The school will act proportionately and fairly. Deliberately false, malicious or vexatious allegations may result in disciplinary action.

11. Record Keeping

The school will maintain secure, confidential records of:

- Concerns raised
- Actions taken
- Outcomes
- Any evidence of detriment or victimisation

Records will be retained securely in accordance with GDPR, the Data Protection Act 2018, safeguarding retention schedules and the school's records management procedures.

12. Review of the Policy

The Governing Body will review this policy **annually**, or earlier if:

- Legislation changes
- Brent Council updates its procedures
- SIAMS or Ofsted guidance changes
- Best practice evolves

Approved by Governing Body:

Date: September 2026

Review cycle: Annual (sooner if guidance changes)

Next review due: September 2027